UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

| In re: | | Case No. |
|--------|---------------------------------|--------------|
| | LeClairRyan, PLLC, ¹ | 19-34574-KRH |
| | Debtor | Chapter 7 |
| | | |

NOTICE OF MOTION AND EXPEDITED HEARING REQUEST

PLEASE TAKE NOTICE that Lynn L. Tavenner, Trustee, not individually, but solely in her capacity as the Chapter 7 trustee (in such capacity, the "Trustee") of the bankruptcy estate (the "Estate") of LeClairRyan PLLC ("LeClairRyan" and/or the "Debtor"), in the above-referenced Chapter 7 case (the "Case") has filed the Motion for Approval of Compromise and Settlement and Memorandum of Law (the "Motion"). The Trustee has also filed the Motion to Expedite Hearing on Trustee's Motion (the "Motion to Expedite"). Copies of the Motion and the Motion to Expedite are being served herewith.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion and Motion to Expedite carefully and discuss them with your attorney if you have one in this chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE on September 4, 2019, the Court entered the Order Establishing Certain Notice, Case Management and Administrative Procedures [ECF. No. 38] (the "Case Management Order"), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the "Case Management Procedures"). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written to request to pberan@tb-lawfirm.com or, for a fee, at https://ecf.vaeb.uscourts.gov.

Paula S. Beran, Esquire (Va. Bar No. 34679) Tavenner & Beran, PLC 20 North Eighth Street, Second Floor

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¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Motion to Expedite, or if you want the Court to consider your views on the Motion, on or before **November 29, 2022, at 1:00 p.m.** (the "**Objection Deadline**"), you or your attorney must file and serve an objection consistent with the Case Management Order.

PLEASE TAKE FURTHER NOTICE THAT the Court will entertain the Motion to Expedite, and if granted, the Motion, on <u>November 29, 2022, at 1:00 p.m.</u> (or such time thereafter as the matter may be heard). In accordance with Richmond General Order 22-2, unless ordered otherwise, the hearing will be conducted both in person and via Zoom with a listen-only line available:

Zoom registration link:

https://www.zoomgov.com/meeting/register/vJIsduytrjIoGS5CTVaDRfaeEmN2lblLzM0

Listen-only conference line:

Dial: 1-866-590-5055 Access Code: 4377075 Security Code: 112922

PLEASE TAKE FURTHER NOTICE THAT any party desiring to object the Motion to Expedite and/or the Motion or otherwise be heard with respect to the same shall also appear and be heard at such time.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: November 27, 2022

Richmond, Virginia

By: /s/ Paula S. Beran

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Counsel for Lynn L. Tavenner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court, I certify that on this 27th day of November 2022, a true copy of the foregoing Notice was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee; (b) the Debtor's 20 Largest Unsecured Creditors; (c) all known secured creditors from the Debtor's Official Form 106D; (d) the Core Parties and 2002 List as defined in the *Case Management Order*; and (e) all parties requesting service of pleadings in this Case (as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ Paula S. Beran

Counsel for Lynn L. Tavenner, Chapter 7 Trustee